

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

*v.*

**GREGORY B. CRAIG,**

*Defendant.*

**Case No. 1:19-cr-0125 (ABJ)**

**NOTICE OF REQUEST FOR JURY QUESTIONNAIRE**

On April 23, 2019, at the Court's direction, Defendant advised the Court of his belief that a jury questionnaire would be appropriate in this case. ECF 13. The government stated its view that a questionnaire would be unnecessary. ECF 12. Defendant respectfully reiterates his request that the Court employ a written questionnaire to assist in the selection of the jury in this case. Attached hereto as Exhibit 1 is the form of questionnaire that Defendant proposes for the Court's use.

Dated: July 16, 2019

Respectfully submitted,

*/s/ William W. Taylor, III*

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William W. Taylor, III (D.C. Bar No. 84194)  
Paula M. Junghans (D.C. Bar No. 474419)  
Ezra B. Marcus (D.C. Bar No. 252685)  
ZUCKERMAN SPAEDER LLP  
1800 M Street N.W. Suite 1000  
Washington, D.C. 20036  
Tel: (202) 778-1800  
Fax: (202) 822-8106  
Email: wtaylor@zuckerman.com  
Email: pjunghans@zuckerman.com  
Email: emarcus@zuckerman.com

William J. Murphy (D.C. Bar No. 350371)  
Adam B. Abelson (D.C. Bar No. 1011291)  
ZUCKERMAN SPAEDER LLP

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100 East Pratt Street, Suite 2440  
Baltimore, MD 21202  
Tel: (410) 332-0444  
Fax: (410) 659-0436  
Email: [wmurphy@zuckerman.com](mailto:wmurphy@zuckerman.com)  
Email: [aabelson@zuckerman.com](mailto:aabelson@zuckerman.com)

*Attorneys for Defendant Gregory B. Craig*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on July 16, 2019, the foregoing was served on counsel of record via the Court's CM/ECF Service.

/s/ Ezra B. Marcus

Ezra B. Marcus

# Exhibit 1

## **JURY QUESTIONNAIRE**

### **Instructions for Jury Questionnaire**

This questionnaire is designed to obtain information about your background as it relates to your service as a juror in this case. We are using it to shorten the jury selection process. The purpose of these questions is to determine whether prospective jurors can impartially decide this case based solely on the evidence presented at trial and the instructions on the law given by the judge. All information contained in this questionnaire will be kept confidential and under seal.

**Please write your assigned juror number at the top of each page.** Respond to each question. Your candor and honesty are necessary so that both the prosecution and the defense will have a meaningful opportunity to select an impartial jury. Your cooperation is of vital importance.

You are sworn to give true and complete answers, and those answers will be available only to the Court and the parties in this case. You are instructed not to discuss this case or the questionnaire with anyone, including your family and fellow jurors.

Please fill out the entire questionnaire. Do not leave any questions blank. If a question does not apply to you in any way, write "N/A" rather than leaving the form blank.

**PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLACK OR BLUE INK  
(NO PENCILS)**

**Personal Information**

1. Name: \_\_\_\_\_
2. Sex: \_\_\_\_\_
3. Date of Birth: \_\_\_\_\_
4. Place of Birth: \_\_\_\_\_
5. Address: \_\_\_\_\_
6. How long have you lived in the District of Columbia? \_\_\_\_\_

**Employment**

7. Are you employed?    \_\_\_ Yes        \_\_\_ No
  - A. If employed, what is your current occupation / job title? \_\_\_\_\_
  - B. Name of employer: \_\_\_\_\_
  - C. How long have you been employed at your current job? \_\_\_\_\_
8. If you are unemployed, please describe any other responsibilities you may have (childcare, school, etc.).  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. If you are retired or between jobs, what type of work had you been doing?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. If you live with a spouse or significant other, is that person employed? \_\_\_\_ Yes \_\_\_\_ No

A. If employed, what is his or her current occupation / job title? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

B. Employer's name: \_\_\_\_\_

C. If he or she is retired or between jobs, what type of work had he or she previously been doing?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### **Education**

11. Check the highest level of education for you and your spouse or significant other:

	You	Spouse/Significant Other
A. Grade school or less	_____	_____
B. Some high school	_____	_____
C. High school graduate	_____	_____
D. Technical or business school	_____	_____
E. Some college	_____	_____
F. College degree	_____	_____
G. Graduate degree (and describe area)	_____	_____ Area: _____

12. If you are a student now, please describe briefly your area of study:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

13. Do you have any difficulty speaking, understanding, reading, or writing the English language?  
\_\_\_\_ Yes \_\_\_\_ No

A. If yes, please explain what is difficult for you:

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**News/Media**

14. What is your main source for news? [Check the one you rely on the most.]

\_\_\_\_ Newspapers/Magazines  
\_\_\_\_ TV or Radio  
\_\_\_\_ Internet/Social media websites

15. Please list any newspapers, magazines, TV or radio shows, or Internet or social media websites that you read, watch, or listen to on a regular basis for news:

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**Criminal Justice Experience**

16. Have you or someone close to you ever been the victim of or a witness to a crime, whether or not that crime was reported to law enforcement authorities? \_\_\_\_ Yes \_\_\_\_ No

A. If yes, please provide the following information for each person and incident:

Relationship of person to you?	Type of of Crime?	Victim or Witness?	Police Report?	Was Anyone Arrested?	Case Outcome?
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17. Have you or someone close to you ever been accused of, arrested for, or charged with a crime?  
\_\_\_\_ Yes                      \_\_\_\_ No

A. If yes, please provide the following:

<u>Relationship?</u>	<u>Type of crime?</u>	<u>Case Outcome?</u>
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_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

18. **If your answer to either question 16 or 17 is yes:** Do you feel that you or the person close to you was treated fairly by the criminal justice system?

_____
_____
_____
_____

19. Apart from jury service, have you ever been involved in any legal proceeding, in any capacity, for example as a plaintiff, defendant, victim, lawyer, witness, or expert?    \_\_\_\_ Yes                      \_\_\_\_ No

A. If yes, please state when and explain why you appeared in court:

_____
_____
_____
_____

B. If yes, did the legal process in that instance operate fairly in your opinion?

_____
_____
_____
_____

**Jury Service / Legal System**

20. Have you ever served as a juror at a trial in a federal, state, or local court prior to today?  
\_\_\_ Yes \_\_\_ No

A. If yes, without disclosing the verdict that you reached, please complete the following for each trial on which you served as a juror:

Criminal or Civil?	Type of Allegations?	When did you serve?	Where did you serve?	Did the jury reach a verdict?
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_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

21. Have you ever served as a juror on a grand jury in federal or state court? \_\_\_ Yes \_\_\_ No

A. If yes, when and where: \_\_\_\_\_

B. Were there any cases in which the grand jury was unable to reach agreement on the issuance of true bills? \_\_\_ Yes \_\_\_ No

C. If yes, describe the case or cases on which the grand jury on which you served was unable to reach agreement. Do not name the person(s) under investigation.

\_\_\_\_\_

\_\_\_\_\_

22. Have you ever reported any kind of fraud or financial crime to any investigative agency?  
\_\_\_ Yes \_\_\_ No

A. If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

23. Have you ever been involved in a "whistleblower" situation? \_\_\_ Yes \_\_\_ No

A. If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Law Enforcement**

24. Have you or someone close to you ever been employed by any law enforcement agency, such as: a police department, sheriff's department, constable's office, the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol Tobacco and Firearms (ATF), the Criminal Enforcement Division of the IRS, the U.S. Marshal's Service, the U.S. Park Police, a United States Attorney's Office, the United States Department of Justice, a District or State's Attorney's Office, a probation or parole office, the Bureau of Prisons, or any other state, local, or federal law enforcement agency or private security force?     \_\_\_ Yes     \_\_\_ No

A. If yes, for each person, please list the law enforcement office or agency, when the person worked there, and a general description of the work he or she did:

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25. A number of witnesses may be either federal or state law enforcement officers. Is there anything about that fact alone that will make it difficult for you to evaluate their testimony fairly and impartially in accordance with the Court's instructions? Put another way, would you tend to believe or to disbelieve the testimony of a law enforcement witness merely because that person is a law enforcement officer?     \_\_\_ Yes     \_\_\_ No

A. Please explain:

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**Legal Profession**

26. Have you or someone close to you ever worked in the legal profession in any way, either as a lawyer, paralegal, or as an administrative assistant in a law office, including a prosecutor's or public defender's office?     \_\_\_ Yes     \_\_\_ No

A. Please describe:

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27. Have you or someone close to you had any legal training, including law courses, paralegal programs, or on-the-job training?    \_\_\_ Yes    \_\_\_ No

A. Please describe:

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28. Do you have any concerns or opinions about the Skadden, Arps, Slate, Meagher & Flom law firm and its activities?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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29. Have you or someone close to you had any bad experiences with a lawyer, a law firm, or with any legal work provided for you?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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30. Do you have any strong feelings or opinions about large “megafirm” or “biglaw” law firms in Washington, D.C.?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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Juror Number: \_\_\_\_\_

31. Do you have any strong feelings or opinions about prosecuting attorneys and the work they do?

\_\_\_ Yes \_\_\_ No

A. If yes, please describe:

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32. Do you have any strong feelings or opinions about criminal defense attorneys and the work they do? \_\_\_ Yes \_\_\_ No

A. If yes, please describe:

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33. In general, would you view evidence presented by the defense differently than you would evidence presented by the prosecution? \_\_\_ Yes \_\_\_ No

A. If yes, please describe:

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34. The jury will be instructed that the defendant is presumed to be innocent throughout the trial and that the defendant cannot be found guilty of any offense unless and until the government has proven each element of that offense beyond a reasonable doubt. Would you find it difficult for any reason to obey that instruction? \_\_\_ Yes \_\_\_ No

A. If yes, please describe:

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**Business / Lobbying Experience**

35. Do you have any strong feelings, opinions, or concerns about large corporations and their role and influence in our society?    ☐ Yes    ☐ No

A. If yes, please describe: \_\_\_\_\_

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36. Have you or someone close to you had any bad experiences with a Washington, D.C.-based lobbyist, a lobbying organization, or with any lobbying work provided for you?  
     ☐ Yes    ☐ No

A. If yes, please describe:

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37. Do you have any strong negative feelings or opinions about Washington, D.C.-based lobbyists?  
     ☐ Yes    ☐ No

A. If yes, please describe:

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**Political Profession**

38. Have you or someone close to you had any bad experiences with a Washington, D.C.-based politician or high-level government official?    ☐ Yes    ☐ No

A. If yes, please describe:

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39. Do you have any strong feelings or opinions about Washington, D.C.-based politicians or high-level government officials?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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**Nature of the Evidence and the Charged Crimes**

40. The indictment charges the defendant with concealing material facts and making false statements to a federal agency about matters related to registration under the Foreign Agents Registration Act (FARA).

Is there anything about the nature of those charges alone that might influence you or make it difficult for you to be a fair and impartial juror in this case?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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41. Some of the witnesses in this case may be people who were involved in crimes themselves. They will testify as part of a cooperation agreement with the government, as part of a guilty plea. Is there anything about that circumstance that might make it difficult for you to evaluate their testimony fairly and impartially in accordance with the Court's instructions?

\_\_\_ Yes    \_\_\_ No

A. If yes, please describe:

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**Foreign Governments**

42. Do you have any strong opinions or feelings about U.S. citizens who are employed by foreign governments?

A. If yes, please describe:

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43. Do you have any strong opinions or feelings about the government of Ukraine?

A. If yes, please describe:

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44. Do you have any strong opinions or feelings about the government of Russia?

A. If yes, please describe:

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45. Do you or anyone close to you have any connection to the country of Ukraine?

\_\_\_ Yes \_\_\_ No

A. If yes, please describe:

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**Knowledge of the Case**

46. This case has received significant publicity in the media. Have you seen, read, or heard anything about this case in any form of media, including newspaper, television, radio, or internet?    \_\_\_ Yes    \_\_\_ No

A. If yes, please explain, to the best of your recollection, (i) what you have seen, read, or heard, (ii) the source of that information, and (iii) when that occurred:

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47. Have you personally written, blogged, or posted anything about this defendant, or this prosecution, or this case?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe when and where you did so and the subject of your comments:

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48. Do you have any strong opinions or feelings about the Mueller Special Counsel investigation?

A. If yes, please describe:

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49. Have you personally written, blogged, or posted anything about the Mueller Special Counsel investigation?    \_\_\_ Yes    \_\_\_ No

A. If yes, please describe when and where you did so and the subject of your comments:

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Juror Number: \_\_\_\_\_

50. If you are selected as a juror on this case, would you be concerned about reactions to your verdict by anyone, including friends, family members, neighbors, acquaintances, or coworkers?  
\_\_\_ Yes, definitely      \_\_\_ Yes, somewhat      \_\_\_ Yes, a little      \_\_\_ No

A. Please explain:

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51. You have been instructed, and you will continue to be instructed if you are selected as a juror, that you may not communicate with anyone about the case, or read or pay attention to any news or social media coverage the case may receive. Is there anything you know of today that will prevent you from complying with that instruction?  
\_\_\_ Yes      \_\_\_ No

A. If yes, please explain:

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52. Do you know anyone else in the pool of prospective jurors here in court today?  
\_\_\_ Yes      \_\_\_ No

A. If yes, please describe:

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**Knowledge of People Associated with the Case**

53. The following is a partial list of individuals whose names may come up in connection with this case. Do you, to your knowledge, have any personal, family, or business connection of any sort with any of them? If so, please circle the name(s) of the person and explain that connection in the space below:

[Name]

[Name]

[Name]

[Name]

[Name]

[Name]

[Name]

[Name]

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54. The lawyers representing the United States during this trial will be Fernando Campoamor-Sanchez, Molly Gaston, and Jason McCullough.

The lawyers representing the defendant will be William Taylor, William Murphy, Paula Junghans, Adam Abelson, and Ezra Marcus.

Judge Amy Berman Jackson will be the judge presiding over the trial.

Do you believe that you know, or have any connection to or association with, any of these people?    \_\_\_ Yes    \_\_\_ No

A. If yes, please explain who you know and how you know them:

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55. If you are selected as a juror in this case, would it be difficult for you to disregard any ideas, notions, or beliefs about the law you may hold, and render a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

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56. Jury selection in this case will begin on . . . .

The trial, and the presentation of evidence to the jurors who are selected, will begin on . . . , and the trial is expected to take approximately three weeks. In this respect, you should know that it is unlawful for an employer to discharge, threaten to discharge, intimidate, or coerce any employee because of the employee's jury service. Given this, is there any circumstance that would prevent you from serving on this jury?     \_\_\_ Yes     \_\_\_ No

A. If yes, please describe:

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57. The Court plans to sit from approximately 9:30 a.m. to 5:00 p.m. each day, with an hour break for lunch and mid-morning and mid-afternoon breaks as well. Do you suffer from any physical or mental condition(s) that would affect your ability to sit for that period of time and pay close and careful attention to the evidence and to render an impartial verdict?     \_\_\_ Yes     \_\_\_ No

A. If yes, please explain:

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Juror Number: \_\_\_\_\_

58. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person in a criminal trial?    \_\_\_ Yes    \_\_\_ No

A. If yes, please explain:

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59. Is there anything about the nature of the questions in this questionnaire that suggests to you that you will not be able to sit as a fair and impartial juror?    \_\_\_ Yes    \_\_\_ No

A. If yes, please explain:

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60. Do you know of any other reason — even if it was not asked in this questionnaire — why you cannot sit as a juror in this case and judge the evidence presented fairly and impartially and apply the law as instructed by the Court?    \_\_\_ Yes    \_\_\_ No

A. If yes, please explain:

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I, \_\_\_\_\_, hereby declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire. I have answered all of the above questions myself.

Signature \_\_\_\_\_

Print full name \_\_\_\_\_

Date \_\_\_\_\_

